

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE: LAURA ANN OLIVER,	{	CHAPTER 13
	{	
	{	
DEBTOR(S)	{	CASE NO. R13-40181-MGD
	{	
	{	JUDGE DIEHL

SUPPLEMENTAL OBJECTION TO CONFIRMATION

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The proposed plan fails to provide for the treatment of the Internal Revenue Service. However, said creditor has filed a secured claim.

2. Pursuant to information received from the Internal Revenue Service, 2012 tax returns have not been provided to the taxing authorities; thereby, preventing the Chapter 13 Trustee from evaluating the feasibility of the Chapter 13 plan, in violation of 11 U.S.C. Sections 1322(d) and 1325(a)(6).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

April 8, 2013

_____/s/_____
Albert C. Guthrie, Attorney
for Chapter 13 Trustee
GA Bar No. 142399

Mary Ida Townson, Chapter 13 Trustee
Suite 2200 - 191 Peachtree Street, N.E.
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R13-40181-MGD

CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR(S):

LAURA ANN OLIVER
27 HAWKS FARM ROAD
WHITE, GA 30184

ATTORNEY FOR DEBTOR(S):

PERROTTA, CAHN & PRIETO, PC.
5 S. PUBLIC SQUARE
CARTERSVILLE, GA 30120

in the foregoing matter with a copy of this pleading by
depositing in the United States Mail a copy of same in a
properly addressed envelope with adequate postage thereon.

This 8th day of April 2013

/s/
Albert C. Guthrie, Attorney
for Chapter 13 Trustee
GA Bar No. 142399

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